

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY**

**WOLLMUTH MAHER & DEUTSCH LLP**

Paul R. DeFilippo, Esq.  
500 Fifth Avenue  
New York, New York 10110  
Telephone: (212) 382-3300  
Facsimile: (212) 382-0050  
pdefilippo@wmd-law.com

**JONES DAY**

Gregory M. Gordon, Esq.  
Brad B. Erens, Esq.  
Dan B. Prieto, Esq.  
Amanda Rush, Esq.  
2727 N. Harwood Street  
Dallas, Texas 75201  
Telephone: (214) 220-3939  
Facsimile: (214) 969-5100  
gmgonson@jonesday.com  
bberens@jonesday.com  
dbprieto@jonesday.com  
asrush@jonesday.com  
(Admitted pro hac vice)

**ATTORNEYS FOR DEBTOR**

In re:

LTL MANAGEMENT LLC,<sup>1</sup>

Debtor.

Case No.: 21-30589 (MBK)

Chapter 11

Subchapter V: ☐ Yes ☒ No

Hearing Date: June 14, 2022

Judge: Michael B. Kaplan

**ADJOURNMENT REQUEST**

1. I, James N. Lawlor,

☒ am the attorney for: LTL Management LLC, the Debtor

☐ am self-represented,

And request an adjournment of the following hearing for the reason set forth below.

Matters: (i) *Debtor's Motion for an Order Authorizing Establishment of a Qualified Settlement Fund for Payment of Talc Claims* [Dkt. No. 8] and (ii) *Debtor's Motion for an Order (A) Authorizing the Filing Under Seal of Certain Confidential Commercial Information in Connection with the Debtor's Motion for an Order Authorizing the Establishment of a Qualified Settlement Fund for Payment of Talc Claims and (B) if Necessary, In Camera Hearing* [Dkt. No. 9].

Current hearing date and time: June 14, 2022 at 10:00 a.m.

<sup>1</sup> The last four digits of the Debtor's taxpayer identification number are 6622. The Debtor's address is 501 George Street, New Brunswick, New Jersey 08933.

New date requested: September Omnibus Hearing

Reason for adjournment: Efficiency would best be served if the above referenced matters are adjourned.

2. Consent to adjournment:

☒ I have the consent of all parties. ☐ I do not have the consent of all parties (explain below):

(i) The United States of America, (ii) the Talc Creditors' Committee, (iii) Aylstock, Witkin, Kreis & Overholtz, PLLC, (iv) Maune Raichle Harley French & Mudd, and (v) Blue Cross and Blue Shield Association have consented to this adjournment.

I certify under penalty of perjury that the foregoing is true.

Date: June 1, 2022

/s/ James N. Lawlor  
Signature

**COURT USE ONLY:**

---

The request for adjournment is:

- |  |  |                                     |
|--|--|-------------------------------------|
| <input checked="" type="checkbox"/> Granted        | New hearing date: <u>7/6/22 At 10 am</u> | <input type="checkbox"/> Peremptory |
| <input type="checkbox"/> Granted over objection(s) | New hearing date: _____                  | <input type="checkbox"/> Peremptory |
| <input type="checkbox"/> Denied                    |  |                                     |

**IMPORTANT: If your request is granted, you must notify interested parties who are not electronic filers of the new hearing date.**